

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RASHMI MANSUR, SWETHA KRISHNAN,
RUCHIR KHANDELWAL, AND ANUPAM
AWAL,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, a federal agency, U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES, a federal agency, and UR
MENDOZA JADDOU,

Defendants.

Case No. 2:22-cv-01675-BJR

JOINT STIPULATION AND ORDER TO
EXTEND DEADLINE

NOTED FOR CONSIDERATION:
MARCH 6, 2023

The parties, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, hereby jointly stipulate and move to extend Defendants' time to respond to the Complaint until April 7, 2023. Plaintiffs are foreign nationals who bring this litigation pursuant to the Administrative Procedure Act and the Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services to adjudicate their visa applications. *See* Dkt. 1. Defendants have yet to answer the Complaint.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*,

784 F.2d 910, 912 (9th Cir. 1986). The parties are currently working in good faith to determine whether this case may be resolved without further litigation. To give the parties time to discuss potential resolution of this case, as well as allow the government additional time for further administrative processing, as needed, the parties stipulate and jointly request that the Court extend Defendants' time to respond to the Complaint until April 7, 2023.

SO STIPULATED.

Dated this 6th day of March, 2023.

FOX ROTHSCHILD LLP

NICHOLAS W. BROWN
United States Attorney

s/ Al Roundtree

AL ROUNDTREE, WSBA #54851
1001 Fourth Ave, Suite 440
Seattle, WA 98154
Phone: 206-624-3600
Fax: 206-389-1708
Email: ARoundtree@FoxRothschild.com

s/ Katie D. Fairchild

KATIE D. FAIRCHILD, WSBA #47712
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: katie.fairchild@usdoj.gov

FRAGOMEN, DEL REY, BERNSEN & LOEWY,
LLP

Attorney for Defendants

s/ Daniel P. Pierce

Daniel P. Pierce (Pro Hac Vice)

I certify that this memorandum contains
192 words, in compliance with the Local
Civil Rules.

s/ Carl W. Hampe


Carl W. Hampe (Pro Hac Vice)
1101 15th Street NW, Suite 700
Washington, DC 20005
Phone: 202-223-5515
Email: dpierce@fragomen.com
Email: champe@fragomen.com

Attorneys for Plaintiffs

ORDER

The parties having stipulated and agreed, it is hereby so ORDERED.

DATED this 13th day of March, 2023.


BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE